

December 8, 2022

The Honorable Judge Ronnie Abrams
United States District Court Southern District of New York
40 Foley Square, Room 2203 New York, NY 10007

The Honorable Judge Sarah L. Cave
United States District Court Southern District of New York
500 Pearl St., Courtroom 18A New York, NY 10007-1312

PLEASE NOTE On Dec. 7, 2022 Plaintiff in ERROR filed a letter with the Court in PAGES NOT in a PDF SEE EXHIBIT #1. Plaintiff resubmits my updated letter with changed date Dec. 8, 2022 with redactions. My first letter for an extension for my expert witnesses did NOT make it on the Docket filed on Wed. Dec. 7, 2022 at 10:23 a.m. EXHIBIT #2 Photo of Pages

RE: Application to the Court for an Extension of Time for Expert Witness Reports

To Honorable Judge Cave and The Honorable Judge Abrams,

Pro Se Plaintiff respectfully extends a request and an application to the Court on behalf of my expert witnesses for an extension of time. As noted on Nov. 23, 2022 Page 64 of the transcript, (EX#3) I mentioned a need for an extension during the Conference Call. After Thanksgiving, I phoned in with my other three expert witnesses. I was informed that one had other previous obligations and cannot produce a report till Jan. 2023. In short, all three experts would appreciate an extension. Additionally, my experts keep asking me if Discovery is finished as this is a necessary issue, particularly Mr. O'Leary. **EXHIBIT #3 Nov. 23, 2022 Transcript Page 64 Plaintiff's Request for Subject of Extension EXHIBIT #4 Email to Plaintiff's Third Witness and lack of response. EXHIBIT #5 Email from Plaintiff's Expert Witness prior commitments due.**

As noted to the Court, in Doc. 320 and in Doc. 322, I recently had to engage my internet expert witness to open the sent Nov. 17, 2022 eml formatted message. He also had to investigate the cryptic code emailed to the Plaintiff on Nov. 23, 2022 during the Conference Call by Adam Bialek. As a result of seeking out Mr. O'Leary's necessary assistance, my internet expert witness spent much of his time involved in diagnosing the coding and writing a notarized affidavit. Mr. O'Leary's time towards the Dec. 12th production of his expected report was blocked by the EAI's eml issue. His time was spent decoding this sudden aversion and attempting to understand which receipt was authentic in the four multiple receipts produced by EAI for the 1972 Oil Painting. Some outstanding Discovery requests with EAI have NOT been produced, such as the native electronic format. I will bring to the Court in another letter. Mr. Duff submitted truncated deficient documents and not the native electronic format.

In regards to my all expert witnesses, all have been responsibly checking in with me and I with them. Additionally, my experts keep asking me if Discovery is finished as this is indeed a necessary factor. My third expert witness has not responded to my most recent email in writing and our last verbal conversation revealed an unpredictable issue which may be delaying his response.

December 8, 2022

Annamarie Trombetta
175 East 96th Street
New York, New York 10128

Respectfully Submitted.

Electronic Signature

/s/ Annamarie Trombetta

Annamarie Trombetta

Gmail - 18-CV-0993-Plaintiff's Dec.7, 2022 Letter App. for Time Expert Reports and Defendant's Non Compliance of Native Electronic Email



Annamarie Trombetta <atrombettaart@gmail.com>

18-CV-0993-Plaintiff's Dec.7, 2022 Letter App. for Time Expert Reports and Defendant's Non Compliance of Native Electronic Email

1 message

Annamarie Trombetta <atrombettaart@gmail.com>

Wed, Dec 7, 2022 at 10:23 AM

To: Temporary_Pro_Se_Filing@nysd.uscourts.gov

To Whom it May Concern in the Pro Se Office::

Plaintiff Annamarie Trombetta
Address 175 East 96th Street (12 R)
New York, New York 10128
Telephone (212) 427-5990

I, Annamarie Trombetta am the Flier in case 18-CV-0993

The two page letter is from the Pro Se Plaintiff Annamarie Trombetta to The Honorable Judge Sarah L. Cave and The Honorable Judge Ronnie Abrams.

I Submit the following:

1) Plaintiff's 2 page Letter titled --- Plaintiff's Dec.7, 2022 Letter Application for Extension and Defendant's Non Compliance of Native Electronic Email

2) Three (3) EXHIBITS in one attachment for December 7, 2022 Letter

Kindly file this 2 letter with 3 exhibits In case Cv-18-0993

Sincerely,
Annamarie Trombetta

2 attachments

-  EXHIBITS to Plaintiff's Dec. 7, 2022 Letter to Court Epdf.pdf
702K
-  December 7, 2022 Letter to the Court 1)Application Extension of Time Expert Witness Report and EAI Non Compliance.pages
382K

Exhibit #2

/Page

Page 3 of 5



New York, New York 10128
Telephone (212) 427-5990

I, Annamaria Trombetta am the Filer in case 18-CV-0993

The two page letter is from the Pro Se Plaintiff Annamaria Trombetta to The Honorable Judge Sarah L. Cave and Abrams.

I Submit the following:

1) Plaintiff's 2 page Letter titled -- Plaintiff's Dec 7, 2022 Letter Application for Extension and Defendant's Non Compliance Email

2) Three (3) EXHIBITS in one attachment for December 7, 2022 Letter

Kindly file this 2 letter with 3 exhibits In case Cv-18-0993

Sincerely,
Annamaria Trombetta

December 7, 2022 Letter to the Court 1) Application Extension of Time Expert Witness Report and EAI Non Compliance, pages

December 7, 2022
Letter to the Court
1) Application Extension



EXHIBITS to Plaintiff

Exhibit #3

64

1

2 defendants to please order a transcript of today's
3 conference. Ms. Trombetta, is there anything else you
4 wanted to raise today?

5

THE PLAINTIFF: It has been a full day. So
6 because I'm dealing with other people, meaning the
7 expert witnesses, and we're approaching the holiday
8 season, if for some reason they cannot submit a report
9 by December 12th, what --

10

THE COURT: You need to make --

11

THE PLAINTIFF: Can I ask for an extension for
12 them?

13

THE COURT: Yes.

14

MR. DUFF: Your Honor, we object, this is
15 Anderson for defendants --

16

THE COURT: I know --

17

MR. DUFF: I'm sorry?

18

THE COURT: I know, but she can make an
19 application and I'll --

20

MR. DUFF: Okay, yes, Your Honor, thank you.

21

THE COURT: I'm not going to prejudge it, but
22 because it sounded like a hypothetical, so maybe we
23 won't. You also have a deadline to file your motion
24 for leave to amend and your proposed amended complaint
25 on December 12th, Ms. Trombetta.

Exhibit #4

Gmail - Annamarie Trombetta Request on Expert Report due on Dec. 12, 2022



Annamarie Trombetta <artofannamarie@gmail.com>

Annamarie Trombetta Request on Expert Report due on Dec. 12, 2022

1 message

Annamarie Trombetta <artofannamarie@gmail.com>

Tue, Dec 6, 2022 at 12:35 PM

To: scelsa/joseph <jvscelsa@italianamericanmuseum.org>

Good Day Dr. Scelsa,

Last week I phone you to find out if your schedule would allow you to complete the expert report that is due on December 12, 2022.

I am contacting you again if there are any updates. If this is not possible, I will need to make an application with the Court for an extension.

Kindly advise as soon as possible.

With Appreciation,

Annamarie Trombetta

Gmail - Past Appraisal Letter



Annamarie Trombetta <atrombettaart@gmail.com>

Past Appraisal Letter

Abigail Hartmann <appraisersaha@gmail.com>

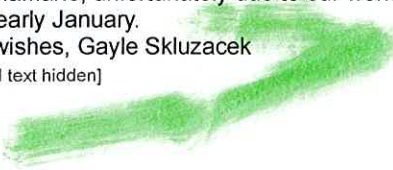
Tue, Dec 6, 2022 at 10:23 AM

To: Annamarie Trombetta <atrombettaart@gmail.com>

Hi Annamarie, unfortunately due to our workload, I cannot complete a report by your 12/12 deadline. We are completely booked until at least early January.

Best wishes, Gayle Skluzacek

[Quoted text hidden]

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